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VIA ECF

May 18, 2021

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007-1312

Re: *Martin v. Brighthouse Life Insurance Company and
Brighthouse Life Insurance Company of New York,*
21-cv-02923-RA

Dear Judge Abrams:

We represent Defendants Brighthouse Life Insurance Company (“BLIC”) and Brighthouse Life Insurance Company of New York (“BLICNY”) in the above-referenced action. We write to respectfully request (i) a short first extension of the deadline for BLIC’s response to Plaintiff’s Class Action Complaint (ECF No. 1) and (ii) that the Court enter a schedule for motion to dismiss briefing. Plaintiff’s counsel consents to the extension request and jointly requests that the Court enter the proposed briefing schedule.

BLIC was served with the Class Action Complaint on May 6, making its response deadline May, 27, 2021. On May 18, 2021, BLICNY agreed to waive service subject to preservation of all defenses or objections to the lawsuit, making its response deadline July 19, 2021. BLIC and BLICNY intend to jointly move to dismiss the Class Action Complaint. Accordingly, all parties request the Court approve the following schedule:

1. June 29, 2021 – Deadline for BLIC and BLICNY motion to dismiss the Class Action Complaint
2. August 5, 2021 – Deadline for Plaintiff’s opposition
3. August 27, 2021 – Deadline for Defendants’ reply

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We respectfully request this briefing schedule to ensure that both Defendants are on the same briefing schedule and because the Class Action Complaint seeks to allege multiple causes of action concerning alleged conduct going back to 1984.

Respectfully,

/s/ Joseph M. McLaughlin

Joseph M. McLaughlin

cc: All counsel of record (via ECF)

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.

May 19, 2021